REMARKS

Applicants thank the Examiner for total consideration given the present application. Claims 1, 4-10, 13-41, 43-58, 60, 61, 63-73, 75-77, 79-86 were pending prior to the final Office Action. Claims 71 and 81 have been canceled through this Reply. Thus, claims 1, 4-10, 13-41, 43-58, 60, 61, 63-70, 72, 73, 75-77, 79-80, 82-86 are currently pending of which claims 1, 10, 27, 33, 43, 50, 55, 70, 73, 75, 77, 83, and 85 are independent. Claims 1, 10, 27, 33, 43, 50, 55, 70, 72, 73, 75, 77, 83, and 85 have been amended through this Reply. Upon careful review, one would conclude that no new matter has been added to the application via this amendment. Support for the amendment can be found at least on page 14, lines 4-17 of the instant specification.

Applicants respectfully request reconsideration of the rejected claims in light of the amendment and remarks presented herein, and earnestly seek timely allowance of all pending claims.

Rejection Under § 112, First Paragraph

Claims 1, 10, 27, 33, 43, 50, 55, 70, 73, 75, 77, 83, and 85 stand rejected under 35 U.S.C. § 112, 1st paragraph, for allegedly containing subject matter not described in the specification in such a way as to reasonably convey to one skilled in the art that the inventor had possession of the claimed invention at the time of filing. Although Applicants do not necessarily agree with the Examiner that the specification lacks support for the claimed term "synchronizing one audio clip with another audio clip", the above-identified claims have been amended through this Reply to address this issue. Therefore, Applicants respectfully request reconsideration and withdrawal of this rejection.

Rejection Under § 103

A. Claims 27-28, 31-35, 39-41, 43-46, 48, 50-56, 58, 60, 63, 66-70, 72, 73, 75, 77 and 82-86 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schilit et al.

(U.S. Patent No. 6,279,014)[hereinafter "Schilit"] in view of Mishra et al. (U.S. Patent No. 5,805,118)[hereinafter "Mishra"] in further view of Oliver (U.S. Patent No. 6,226,422)[hereinafter "Oliver"] and in further view of Lucas et al. (U.S. Patent No. 6,012,074)[hereinafter "Lucas"]. Applicants respectfully traverse the rejection.

For a Section 103 rejection to be proper, a *prima facie* case of obviousness must be established. *See M.P.E.P. 2142.* One requirement to establish *prima facie* case of obviousness is that the prior art references, when combined, must teach or suggest all claim limitations. *See M.P.E.P. 2142; M.P.E.P. 706.02(j).* Thus, if the cited references fail to teach or suggest one or more elements, then the rejection is improper and must be withdrawn.

In this instance, it is respectfully submitted that none of the cited prior art references, either alone or in combination, teaches all claim limitations. For example, independent claim 27 recites, *inter alia,*

> wherein the properties include *__position data indicating the location in the electronic information at which the author inserted each audio clip and time data indicating the time of recording of each audio clip during a session__*;
> *__a navigation history feature__* for recording all document navigations indexed by time so that the system can *__simultaneously__* play back, not only the audio clip recorded during the session, but also a sequence of document navigations;
> an audio input for receiving *__verbally__* delimited keywords and *__converting said verbally delimited keywords into search queries__*;
> wherein the user interface is controlled by a processor which allows *__dynamically accessing the audio clips based on the search queries__*. (*Emphasis added.*)

Independent claims 33, 43, 50, 55, 70, 73, 75, 77, 83, and 85 also recite, *inter alia,* the above-identified claim features with some minor variation in wordings.

The Examiner acknowledges that none of Schilit, Mishra, or Oliver, either alone or in combination, teaches or suggests an audio input for receiving *__verbally__* delimited keywords and *__converting said verbally delimited keywords into search queries__*; wherein the user interface is controlled by a processor which allows *__dynamically accessing the audio clips based on the search queries__*. Thus, the Examiner again alleges that Lucas fulfills the deficiency of Schilit, Mishra, or Oliver. Regarding this claim feature, the Examiner totally failed to particularly address Applicants' previously filed arguments. Indeed, the Examiner merely states,

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"Applicant's arguments fail to comply with 37 CFR 1.111(b) because they amount to a general allegation that the claims define a patentable invention without specifically pointing out how the language of the claims patentably distinguishes them from the references." (*See page 3, lines 6-9 of the final Office Action.*)

Applicants respectfully submit that the Examiner's such allegation is totally unfounded. It is noted that the Applicants specifically pointed out how the language of the claims patentably distinguishes them from the references. (*See pages 5 and 6 of the Reply filed April 28, 2008.*)

Applicants again submit that Lucas merely discloses a conventional document management apparatus which allows a user to define delimiters in order to specify portions of documents or attributes of documents to be retrieved from a document repository. The repository is then searched for the defined delimiters and the portions of the documents or the attributes of documents are retrieved and put into a cache memory. (*See Abstract.*)

As previously submitted, Lucas discloses a "chunk" which is a delimited portion of an object such as an attribute or a document. According to Lucas, chunk is used to efficiently manipulate pieces of data rather than perform operations on entire objects. (See col. 21, lines 35-38.) In Fig. 19, Lucas illustrates a repository 1910 which includes a chunk processing means 1915 and a memory 1916 containing a document 1920 with attributes 1922, 1924, 1926. The repository could, for example, be a computer with a CPU and a hard drive for storage. A chunk 1930 is defined in one of the attributes 1922. The repository 1910 is connected to a network 1935. A computer 1940 having an input means 1945, such as a terminal and a mouse, and a CPU 1950 and a cache 1955 is also connected to the network 1935. Lucas further discloses that when a piece of an attribute is needed, a request is sent to the repository 1910. The chunk processing means 1915 then searches the repository 1910, finds the chunk 1930 which was requested and sends it over the network 1935 to the cache 1955. The cache 1955 stores chunks and also keeps a record of the chunks. That is, the cache maintains a data structure with records of which parts of attributes are stored in it. If, for instance, an entire attribute is later requested, only those parts

which were not already in the cache would be requested from the repository. (*See col. 22, line 64 to col. 23, line 14.*)

Although Lucas suggests that the input means 1945 (i.e., a mouse) can be a voice control display (see col. 3, line 43), nowhere does Lucas teach or suggest that such voice control display is "an audio input" for "receiving ***verbally*** delimited keywords and ***converting said verbally delimited keywords into search queries***."

First, Lucas fails to teach that the "chunks" are "verbally delimited keywords". It appears that Examiner is alleging that since Lucas discloses a mouse which can be replaced by a voice control display, Lucas provides teaching or suggestion for receiving verbally delimited keywords and converting the verbally delimited keywords into search queries. However, the relied upon portions of Lucas suggest that the mouse can be used to ***select*** and ***move*** documents within the display (see col. 3, lines 38-41). Thus, even if, a voice control display is used instead of the mouse, a user can only select and move documents within the display using such voice control display. Lucas provides no teaching or suggestion that such voice control display can be used to receive verbally delimited keywords and converting the verbally delimited keywords into search queries.

Second, Lucas fails to teach that these chunks are converted into search queries. Lucas simply teaches that chunks are specified by user-defined delimiters at run-time. (*See col. 21, lines 42-43.*)

Further, Lucas is distinguished from the claimed invention in that Lucas fails to teach a user interface that is controlled by a processor which allows ***dynamically accessing the audio clips based on the search queries***. (*Emphasis added.*) Lucas simply teaches that the chunk processing means 1915 searches the repository 1910, finds the chunk 1930 which was requested and sends it over the network 1935 to the cache 1955. Accordingly, it is respectfully submitted that Lucas fails to teach or suggest "an audio input for receiving verbally delimited keywords and converting said verbally delimited keywords into search queries . . . dynamically accessing the audio clips based on the search queries" as recited in independent claim 27.

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Further, it is respectfully submitted that the none of the cited prior art references, either alone or in combination, teaches or suggests "wherein the properties include ***position data indicating the location in the electronic information at which the author inserted each audio clip and time data indicating the time of recording of each audio clip during a session*** and ***a navigation history feature*** for recording all document navigations indexed by time so that the system can ***simultaneously*** play back, not only the audio clip recorded during the session, but also a sequence of document navigations" as recited in amended claim 27.

Therefore, for at least these reasons, independent claim 27 is patentably distinct from Schilit, Mishra, Oliver, and Lucas. As mentioned above, independent claims 33, 43, 50, 55, 70, 73, 75, 77, 83, and 85 recite similar claim features as in claim 27. Therefore, these claims are also patentably distinct from Schilit, Mishra, Oliver, and Lucas for the same reasons stated above in regard to claim 27.

Claims 28, 31-32, 34-35, 39-41, 44-46, 48, 51-54, 56, 58, 60, 63, 66-69, 72, 82, 84 and 86, which depend from these independent claims are patentably distinct from Schilit, Mishra, Oliver, and Lucas for at least the same reasons as their ultimate base claims and further in view of the novel features recited therein.

B. Claims 1, 4-6, 9-10 and 13-26 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Milne et al. (U.S. Patent No. 5,390,138)[hereinafter "Milne"] in view of Mishra in further view of Oliver and Lucas. Claim 7 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Milne in view of Mishra and in further view of Oliver, Lucas, and Hou (US 5,838,313). Claim 8 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Milne in view of Mishra and in further view of Oliver and Lucas, in view of Dwyer et al. (U.S. Patent No. 6,571,211)[hereinafter "Dwyer"]. Claim 29 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schilit in view of Mishra and further in view of Oliver and Lucas, and in further view of Headley et al. (U.S. Publication No. 2002/0194260)[hereinafter "Headley"]. Claim 30 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schilit in view of Mishra and in further view of Oliver and

Lucas, and in further view of Aihara et al. (U.S. Patent No. 5,644,674)[hereinafter "Aihara"]. Claim 36 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schilit in view of Mishra and in further view of Oliver and Lucas, in view of Fielder et al. (U.S. Patent No. 6,205,419)[hereinafter "Fielder"]. Claim 37 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schilit in view of Mishra and in further view of Oliver and Lucas, in view of Hou et al. (U.S. Patent No. 5,838,313)[hereinafter "Hou"]. Claim 38 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schilit in view of Mishra and in further view of Oliver and Lucas, in view of Dwyer. Claims 47 and 76 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schilit in view of Mishra and in further view of Oliver, Lucas and Milne. Claim 49 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schilit in view of Mishra and in further view of Oliver and Lucas, in view of Pritt (U.S. Patent No. 5,689,717)[hereinafter "Pritt"]. Claims 57 and 61 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schilit in view of Mishra and in further view of Oliver and Lucas, in view of Jain et al. (U.S. Patent No. 6,144,375)[hereinafter "Jain"]. Claim 59 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schilit in view of Mishra and in further view of Oliver and Lucas, in view of Hurtado et al. (U.S. Patent No. 6,418,421)[hereinafter "Hurtado"]. Claims 64 and 65 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schilit in view of Mishra and in further view of Oliver and Lucas, in view of Martin et al. (U.S. Patent No. 6,272,484)[hereinafter "Martin"]. Claims 79-80 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schilit in view of Mishra and in further view of Oliver and Lucas, in view of Miller et al. (U.S. Patent No. 5,801,685)[hereinafter "Miller"].

Applicants respectfully traverse these rejections for the following reasons. Applicants' independent claim 1 recites, *inter alia*,

> wherein the properties include ***position data indicating the location in the electronic information at which the author inserted each audio clip and time data indicating the time of recording of each audio clip during a session***;
> ***a navigation history feature*** for recording all document navigations indexed by time so that both the audio clip recorded during the session and a sequence of document navigations can be played back ***simultaneously***;
> wherein said audio input receives ***verbally delimited keywords*** and converts said ***verbally delimited keywords into search queries***, and

           wherein the processor allows *dynamically accessing the audio clips based on*
the search queries." (*Emphasis added.*)

Independent claim 10 also recites, *inter alia*, the above-identified claim features with
some minor variation in wordings. As demonstrated above in great detail, none of the cited prior
art references, either alone or in combination, teaches or suggest the above-identified claim
features of claims 1 and 10. Therefore, it is respectfully submitted that independent claims 1 and
10 are distinguishable from the applied prior art references. Claims 4-10 depend from claim 1
and claims 13-26 depend from claim 10. Thus, these claims are at least allowable by virtue of
their dependency on corresponding independent claim.

Dependent claims 29-30, 36-38, 47, 49, 57, 61, 64-65, 76, and 79-80, are at least
allowable by virtue of their dependency on corresponding allowable independent claims 27, 33,
43, 55, 73, or 75. None of Headley, Aihara, Hou, Dwyer, Milne, Pritt, Jain, Hurtado, Martin, or
Miller, overcomes the above-identified deficiencies of cited prior art references applied against
the independent claims 27, 33, 43, 55, 73, 75.

CONCLUSION

In view of the above amendment and remarks, Applicants believe the pending application
is in condition for allowance.

Should there be any outstanding matters that need to be resolved in the present
application, the Examiner is respectfully requested to contact Ali M. Imam Reg. No. 58,755 at
the telephone number of the undersigned below, to conduct an interview in an effort to expedite
prosecution in connection with the present application.

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    If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies

to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional

fees required under 37.C.F.R. §§1.16 or 1.147; particularly, extension of time fees.

Dated: October 17, 2008   Respectfully submitted,

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